

UNITED STATE DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

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SECURITIES AND EXCHANGE COMMISSION,

Plaintiff,

No. 1:23-cv-5749

v.

**AFFIDAVIT IN SUPPORT OF  
MOTION TO ADMIT COUNSEL  
*PRO HAC VICE***

RICHARD J. SCHUELER, a/k/a RICHARD HEART,  
HEX, PULSECHAIN, and PULSEX,

Defendants.  
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I, Nicolas Morgan, being duly sworn, hereby depose and say as follows:

1. I am an attorney employed by Investor Choice Advocates Network.
2. I submit this affidavit in support of my motion for admission to practice *pro hac vice* in the above-captioned matter.
3. As shown in the Certificate of Good Standing annexed hereto, I am a member in good standing of the bar of the State of California.
4. There are no pending disciplinary proceedings against me in any state or federal court.
5. I have not been convicted of a felony.
6. I have not been censured, suspended, disbarred or denied admission or readmission by any court.
7. Attorney Registration Number: 166441.

8. Wherefore, your affiant respectfully submits that he be permitted to appear as counsel and advocate *pro hac vice* in case 1:23-cv-5749 for as counsel for *Amicus Curiae* PulseChain Foundation DAO.

Dated: May 1, 2024  
Ventura, CA

By:   
Nicolas Morgan  
453 S. Spring Street, Suite 400  
Los Angeles, CA 90013  
Telephone: (310) 849-0384  
Nicolas.Morgan@icanlaw.org

*Attorney for Amicus Curiae PulseChain  
Foundation DAO*

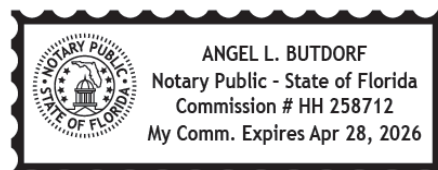
State of Florida  
County of Highlands

On 05/01/2024 before me, Angel L Butdorf  
personally appeared Nicolas Morgan, who proved to me on the basis of satisfactory evidence to be the person whose name is subscribed to the within instrument and acknowledged to me that he executed the same in his authorized capacity, and that by his signature on the instrument the person, or the entity upon behalf of which the person acted, executed the instrument.

I certify under PENALTY OF PERJURY under the laws of the State of Florida that the foregoing paragraph is true and correct.

WITNESS my hand and official seal.

Signature  (Seal)  
Angel L Butdorf



Signer(s) Nicolas Morgan, produced CA DL, as identification, along with multi-factor authentication and audio/video recording to be notarized online.